

Appln No. 09/690,066

Amdt date April 18, 2005

Reply to Office action of December 16, 2004

#### REMARKS/ARGUMENTS

Applicants thank the Examiner for his careful consideration of this application. In response to the above-identified Office action, Applicants amend the application and seek reconsideration, re-examination and allowance thereof. In this response Applicants do not add any new claims. Applicants amend claims 1, 4-11, 21, 50, 54-60, 69, 121-124 and 131. Applicants cancel claims 3, 53 and 120. Accordingly, claims 1, 2, 4-52, 54-119 and 121-161 are still pending.

#### I. Claims Restricted Under 35 U.S.C. §102

Claims 1-161 are rejected under 35 U.S.C. §102 as being anticipated by U.S. Patent No. 6,005,945 issued to Whitehouse (hereinafter "Whitehouse"). Applicants respectfully request that the rejection be withdrawn.

In order to establish a *prima facie* case of anticipation, the Examiner must show that the cited reference teaches each of the elements of the claim. In regard to independent claim 1, this claim as submitted includes the elements of "wherein the cryptographic device authenticates the identity of each user and authenticates the user for a role, the role limiting the user to a subset of operations performed by the system." Applicants have reviewed Whitehouse but have been unable to discern any part therein that teaches these elements of claim 1. Rather Whitehouse teaches a system that allows a user to access and execute a full range of available operations, as long as the user provides the proper authentication information for a user account. See col. 6, lines 46-65 of Whitehouse. Thus, Whitehouse does not teach "limiting the user to a subset of

Appln No. 09/690,066

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operations performed by the system" as recited in amended claim 1. Therefore, claim 1, as amended, is not anticipated by Whitehouse. Accordingly, reconsideration and withdrawal of the anticipation objection of claim 1 are requested.

In regard to claims 2 and 4-49, these claims depend from independent claim 1 and incorporate the limitations thereof. Thus, at least for the reason mentioned above in regard to independent claim 1, these claims are not anticipated by Whitehouse. Accordingly, reconsideration and withdrawal of the anticipation rejection of these claims are requested.

In regard to independent claims 50, 92, 117 and 131, these claims include the elements of "verifying that the requesting user is authorized to assume a role and to perform a corresponding operation, the role limiting the user to a subset of commands provided" (claim 50), "wherein the cryptographic device authenticates the identity of the user and restricts services to the user based on stored information in the database" (claim 92), "wherein the cryptographic device authenticates the identity of the user and provides a specialized set of operations to the user based on user information in the database" (claim 117) and "requesting by a user authorization for a role, the role restricting the user to less than a full set of commands" (claim 131). As mentioned above in regard to independent claim 1, the Applicants have been unable to discern any part of Whitehouse that teaches restricting a set of commands or providing a specialized set of commands to a user. Rather, Whitehouse teaches a system where all users have the same commands available to them. Therefore,

**Appln No. 09/690,066**

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Whitehouse does not teach each of the elements of these independent claims. Accordingly, reconsideration and withdrawal of the anticipation rejection of these claims are requested.

In regard to dependent claims 51, 52, 54-91, 92-116, 118-130 and 132-161, these claims depend from independent claims 50, 92, 117 and 131 and incorporate the limitations thereof. Thus, at least for the reasons mentioned above in regard to these independent claims, these claims are not anticipated by Whitehouse. Accordingly, reconsideration and withdrawal of the anticipation objection of these claims are requested.

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## II. Conclusion

In view of the foregoing, it is believed that all claims now pending, namely claims 1, 2, 4-52, 54-119 and 121-161 patentably define the subject invention over the prior art of record and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving this application forward to allowance, the Examiner is encouraged to contact the undersigned at (626) 795-9900.

Respectfully submitted,

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